

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROXENSE, LLC,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

C.A. No. 6:20-cv-00879-ADA

**DECLARATION OF CHRISTOPHER J. TYSON IN SUPPORT OF DEFENDANT’S
RESPONSIVE CLAIM CONSTRUCTION BRIEF**

1. I make this Declaration of my own free will.
2. I am an attorney with the law firm Duane Morris LLP and licensed to practice law in Virginia and Washington D.C.
3. I represent Defendant Target Corporation (“Defendant” or “Target”) and I submit this declaration in support of Defendant’s Responsive Claim Construction Brief filed concurrently herewith.
4. Attached hereto as **Exhibit A** is a true and correct copy of the Declaration of Dr. Benjamin Goldberg with Regard to Certain Claim Phrases in U.S. Patent No. 10,455,533 dated June 14, 2021.
5. Attached hereto as **Exhibit B** is a true and correct copy of U.S. Provisional Patent Application No. 60/760,362 (the “’362 Provisional”) which I electronically retrieved from the records of the United States Patent and Trademark Office (“USPTO”).

6. I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 14, 2021

s/ Christopher J. Tyson
Christopher J. Tyson